

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**LISA HILL-GREEN, *on behalf of herself
and all others similarly situated,***

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.,**

Defendant.

Civil Action No. 3:19-cv-00708-MHL

**JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE
MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT**

COME NOW the Plaintiff and Defendant Experian Information Solutions, Inc. (“Experian”) (collectively, “the Parties”), by counsel and pursuant to Federal Rule of Procedure 6(b), to move this Court for an enlargement of time in which to file a motion for preliminary approval of class settlement, which is currently due to be filed on November 2, 2021.

This motion is made in good faith and not for a dilatory purpose. As the Parties apprised this Court in a prior Joint Status Report (Dkt. No. 79, Sept. 27, 2021), the Parties engaged in mediation with the Hon. Diane Welsh (Ret.) and reached a preliminary agreement to settle Plaintiff’s claims on behalf of the class for injunctive relief under Rule 23(b)(2). The Court ordered the Parties to file a motion for preliminary approval of that settlement by November 2, 2021. The Parties have been working diligently and in good faith to reach agreement on the terms of the settlement and the settlement agreement was reached today. The parties are now preparing the documents that will accompany a motion for preliminary approval.

Wherefore, the Parties hereby request that the deadline to file a motion for preliminary approval of the class settlement be extended 7 days, until Tuesday, November 9, 2021. The Parties do not seek extension of any other deadline.

Respectfully submitted,

EXPERIAN INFORMATION
SOLUTIONS, INC.

LISA HILL-GREEN

s/ David N. Anthony
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